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Fighting for Employee Justice



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November 26, 2024

VIA ECF

Honorable Jesse M. Furman
United States District Judge
United States District Court
Southern District of New York
40 Foley Square, Room 1105
New York, New York 10007

Re: **Robles v. HG Putnam, Inc.,**
Dkt. No.: 24-CV-7548 (JMF)

Dear Judge Furman:

We represent Plaintiff, Primitivo Robles (“Plaintiff”) in the above referenced Americans with Disabilities (“ADA”) matter. We write now in response to Your Honor’s Order, dated November 25, 2024, directing Plaintiff to, “[s]ubmit a letter addressing whether Plaintiff has had any contact with Defendant or if he has any other reason to believe that defendant has actual notice of this lawsuit.” (Docket No. 8).

Plaintiff filed this ADA action against Defendant, HG Putnam, Inc., on October 4, 2024, and lawfully served Defendant on October 24, 2024. Defendant had until November 14, 2024, to file their Answer to the Complaint. Despite Plaintiff’s exercise of due diligence, Defendant has failed to appear in this action and has failed to respond to Plaintiff’s alternative queries requesting their intent.

Plaintiff’s Attempt to Serve Defendant

Just prior to and subsequent to November 14, 2024, our office attempted to contact Defendant both via email and through telephone, but to no avail. Specifically, Plaintiff directed various emails to the presumed owner of HG Putnam, Inc., Ms. Danielle Canora at

info@hudsonvalleyhemp.com, without receiving a reply. ¹ (**See Ex. 1) (Two Separate emails, dated November 15, 2024, and November 26, 2024)**). Additionally, on November 16, 2024, and November 21, 2024, Joseph & Norinsberg, LLC's ADA Compliance Chief, Mitchell Pomerance had called the Websites posted phone number, (845) 442-3346, without being able to reach any personnel who could offer information in relation to the Defendant's founder and creator, Ms. Susan Canora.

Moreover, the undersigned has caused to be mailed, via the United States Postal Service, by first-class mail, a copy of Your Honor's Order, dated 11/25/2024 as directed. (**see Ex. 2, Postal Service Receipts**)

We will continue our efforts to contact Defendant, and we will advise the Court by letter on December 6, 2024, if we have made any progress on this front.

We thank the Court for its time and attention in this matter.

Sincerely,



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Senior Partner
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¹ Plaintiff learned of Defendant's ownership through a review of their Website's homepage, www.hudsonvalleyhemp.com/pages/meet-the-staff. On either occasion, Plaintiff informed Ms. Canora of the pending lawsuit; her obligation to contact either Plaintiff's counsel directly or retained counsel to avoid the filing of a motion for default judgment. Attached to the former email, Plaintiff attached a copy of the relevant Complaint, the Summons, and all Exhibits; while the latter email had attached thereto, the same documentation plus a copy of this Court's recent Order, dated 11/25/2024. **See Ex. 1 (emails dated Nov. 15, 2024, and November 26, 2024)** The letters and calls went and remain unanswered.